



J. Onaodowan, Esq.

eonaodowan@eocdlaw.com

t 646.375.2119 c 718.427.3139

Christine E. Delince, Esq.

cdelince@eocdlaw.com

t 646.375.2117 c 917.238.9332

November 10, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: U.S. v. Martinez (MKV)
20 Cr. 213

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/10/2020

Dear Judge Vyskocil,

I represent Victor Martinez in the above captioned case. He is currently out on bond with his travel is restricted to the Eastern and Southern Districts of New York, and Boston, Massachusetts. This Saturday December 12 is his son's birthday. Mr. Martinez would like to take his son to the Nickelodeon Universe American Dream theme park, which is located in East Rutherford, New Jersey. I am writing to respectfully request that Mr. Martinez's bail conditions be modified to allow him to travel to the District of New Jersey on Saturday December 12, 2020 from 3:00PM to 10:30PM.

I have spoken to the Government who take no position but defer to Pretrial Services.

Respectfully Submitted,

Christine Delince, Esq.

DENIED. SO ORDERED.

Date: 12/10/2020
New York, New York

Mary Kay Vyskocil
United States District Judge